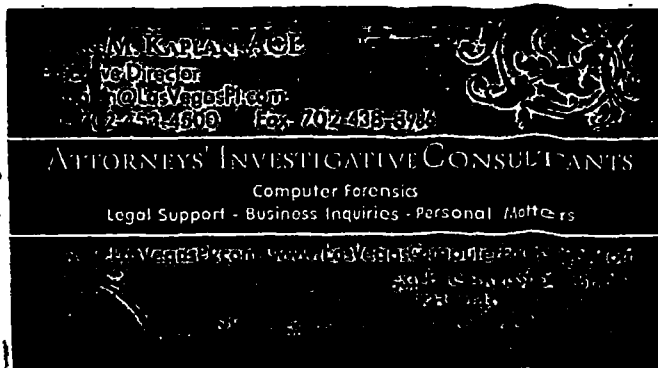


MUR #6606



State of Nevada

County of Clark

Affidavit of Alan M. Kaplan

1. My name is Alan M. Kaplan. I have been licensed as a Nevada private investigator since November 1978 under Nevada PI license # 220. Since that time I have been engaged full-time as a private investigator, functioning as the Executive Director of the company I founded, Attorneys' Investigative Consultants. Prior to that time, I was employed as a Senior Investigator for Summa Corporation, the umbrella Corporation for the late billionaire, Howard Hughes. Prior to that time I served as a Special Agent with the Air Force Office of Special Investigation (OSI). At the time of my retirement from the OSI, I served as worldwide Chief of the Criminal Operations Division (OSI). My aggregate investigative experience is over 48 years.
2. On 07/23/12 I received a letter (FEC file MUR- 6606), dated 07/18/12, (It was actually addressed to my wife of 57 years, and business partner, Ruth E. Kaplan NV PI license #371, as "Registered Agent") from Jeff S. Jordan, Supervisory Attorney, Complaints Examination and Legal Administration, Federal Election Commission, It is my position that there is no corporation involved in this campaign contribution and as a consequence there is no "Registered Agent". As one of the two owners of our company, I am herein responding to that letter.
- 2.1. I have read that under 2 U.S.C. §437g(a)(4)(B) and §437g(a)(12)(A), I have a right to have this matter treated as confidential. I understand that right and do not wish to exercise it. On the contrary, in order to try to salvage my reputation and refute the false allegation made against me, I want all parties to understand that I want this matter to be made public. This affidavit constitutes written

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COMMISSION

authorization for the FEC and all other parties known or unknown to publicize this file, in full only, without editing.

2.2. I have read that I have a right to be represented by counsel in this matter. I understand that right and do not wish to exercise it. I am not an attorney, but will represent myself in this matter.

2.3. I understand that I have a legal obligation under 18 U.S.C. § 1519 to retain all relevant material until the commission has closed its file in this matter. I will comply.

3. Attached to the aforementioned letter from Mr. Jordan, was an affidavit signed by Roberta A. Lange, Chair of the Nevada State Democratic Party on 06/26/12 and stamped as received by the FEC Office of General Counsel on 07/11/12.

3.1. In her affidavit Ms. Lang characterized a \$10.00 contribution I made to Republican candidate Danny Tarkanian's 2012 congressional campaign as "an illegal corporate contribution". The facts are as follows:

3.1.1. I find no record of making the \$10.00 contribution to Mr. Tarkanian or having it returned by Mr. Tarkanian. However, I do have a very clear independent recollection of making that contribution on or about the time alleged and that it was subsequently returned by Mr. Tarkanian with an explanation that he was not permitted to accept contributions from corporations. I am hereby stipulating to that scenario.

3.1.2. I should, under ordinary circumstances, have been able to trace it, but the only payment it might be is one made through PayPal which can lead either to my American Express Gold card or my business bank account. There is a \$10.00 PayPal withdrawal from my business bank account on about the time alleged. My best guess is that that is the Tarkanian contribution at issue. I

don't recall what happened to the check when it was returned to me. My best guess is that I shredded it.

- 3.1.3. All of the foregoing would be relevant if I had indeed made in the "illegal corporate contribution" alleged. The fact is I did not make an illegal corporate contribution because there is no corporation.
- 3.1.4. Attorneys Investigative Consultants, is and has been, at all times since 1978, the dba of Alan M. Kaplan, Private Investigator. I have been operating our private investigative business since 1978 and at all times licensed by the State of Nevada as a sole proprietorship. This can be verified by the records of the Private Investigator's Licensing Board which operates under the Nevada Attorney General.
- 3.1.5. In approximately 1986 I set up a Nevada Corporation named, "Attorneys' Investigative Consultants, Inc.". The reasons for that are not relevant, but at the time I was considering expanding and thought about using that entity as a vehicle. For about 14 years, I maintained an "Active" status for Attorneys' Investigative Consultants, Inc. with the Nevada Secretary of State. I thought that I might someday reconsider that plan and that in the interim, having that name filed as a corporation would dissuade others from trying to steal my (we think) valuable dba.
- 3.1.4.1 In 2010, I decided that it was not really worth the refiling fee, so I made no payment and did not file the required list of officers, The Corporation was revoked by the Nevada Secretary of State. That is the current status. (See exhibit "A".)
- 3.1.4.2 At no time was there a bank account opened or a credit card issued in the name of "Attorneys' Investigative Consultants, Inc. Nor did I ever do business as Attorneys' Investigative Consultants, Inc.

3.1.6. It's also important to note that if I had operated my business as a Corporation I would have had to go through a relicensing procedure by the Private Investigator's Licensing Board. That, of course, never took place.

3.1.7. Two other things that are important to note. The first is that I have two accounts at US Bank. One is a business account and the other is a personal account. Neither has ever been an account of any corporation. Both of those accounts are mine personally. The same is true for our American Express accounts. We have three cards including my business cards. All are personal cards rather corporate cards.

4. Although Danny Tarkanian has run for public office previously I have no recollection of having corresponded with him prior to this election. However, I did find two recent e-mails that I sent to Mr. Tarkanian.

4.1. The first was dated 04/27/12 (see exhibit "B".) As can be seen from the text of the e-mail, I did not discuss my campaign contribution. A possible violation of federal law was the furthest thing from my mind.

4.2. The second e-mail is dated 07/13/12. (See exhibit "C".) That e-mail does discuss the fact that Mr. Tarkanian returned my campaign contribution. As can be seen, I explained why my contribution was lawful. It is obvious that Mr. Tarkanian, like the Federal Election Commission, was duped by the false allegation of Roberta A. Lange, Chair of the Nevada State Democratic Party.

5. I am 84 years old and Ruth is 82.


In spite of that, we're still active in business and neither old age nor disability has caused us to lose our appetite for good government. As a consequence, we became very interested in the current election. We looked at candidates and determined that Danny Tarkanian was a man of integrity - a bright guy well worth supporting. So I gave him a few dollars as is my constitutional right to do

under the First Amendment. Little did I know that that lawful act would be perverted into a violation of federal law causing me to be made the subject of a federal investigation.

5.1 I find it particularly ironic that Ms. Lange, operating under color of law, used the FEC and this vehicle, to not only smear me with a false allegation, but to also try to limit my First Amendment rights. I don't know if Ms. Lange made this false allegation because she equated old age with timidity or stupidity and thought we would be easy people to bully, or if she simply went off half cocked and threw a bunch of allegations against the wall, not caring who she damaged and not taking the time to learn how businesses function or that all businesses are not necessarily corporations.

6. I swear that the foregoing is true to the best of my knowledge and belief. If necessary, I will testify in a court of law as to what it contained herein.

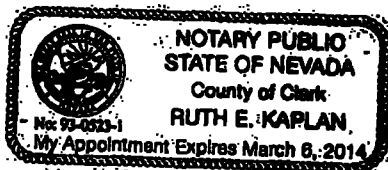
July 25, 2012


Alan M. Kaplan, ACE, Executive Director
Nevada PI license #220
Attorneys' Investigative Consultants
5841 E. Charleston Blvd
Las Vegas, NV 89142

Subscribed and sworn (or affirmed) before

me this 25th day of July, 2012


RUTH E. KAPLAN



6:13:14 PM 7/25/2012

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Nevada Business Search

* Includes Trademarks, Trade Names, Service Marks, Reserved Names & Business Licenses

Search by Entity Name: ATTORNEYS' INVESTIGATIVE CONSULTANT

☒ Include phonetic matches

Sort by Relevance ☐ descending ☐ ascending order

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Entity Name	NV Business ID	Status	Type
ATTORNEYS' INVESTIGATIVE CONSULTANTS, INC.	NV19881001072	Revoked	Domestic Corporation
"ADDITIONS INCORPORATED"	NV19921035895	Permanently Revoked	Domestic Corporation
A&D AUTOMATIC GATE AND ACCESS NEVADA	NV20041700866	Active	Domestic Corporation
A-ATTORNEY LEGAL CLINIC		Expired	Trade Name
A-D-RAM MECHANICAL	NV20001355517	Active	Domestic Corporation
A-DREAM, INC.	NV19991218245	Permanently Revoked	Domestic Corporation
A-T WATER TRUCK SERVICES, INC.	NV20001512777	Revoked	Domestic Corporation
A-TARO ENTERPRISES, INC.	NV20101038760	Active	Domestic Corporation
A-TRAIN JANITORIAL, INC.	NV20041453697	Default	Domestic Close Corporation
A-TRAIN RECORDS, INC.	NV19981240613	Permanently Revoked	Domestic Corporation
A-TRAIN1 ENTERPRISES, LLC	NV20121087981	Active	Domestic Limited-Liability Company
A-TRINITY TRUCK REPAIR, LLC	NV20051157411	Dissolved	Domestic Limited-Liability Company
A.D. RANCHING, COMPANY, LLC	NV19961029574	Permanently Revoked	Domestic Limited-Liability Company
A.T.A.A. TRAVEL GROUP		Expired	Trade Name
A.T.R. INTERNATIONAL MARKETING INC.	NV20061191974	Dissolved	Domestic Corporation
AA TRANSPORT, INC.	NV20021446826	Permanently Revoked	Domestic Corporation
AA TURNING POINT	NV19951164800	Permanently Revoked	Domestic Non-Profit Corporation
AA TURNKEY COMPUTER SOLUTIONS	NV20031280882	Permanently Revoked	Domestic Corporation
AAA DRAIN CLEANING LLC	NV20071167345	Active	Domestic Limited-Liability Company

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Business Entity Information

Status:	Revoked	File Date:	1/17/1986
Type:	Domestic Corporation	Entity Number:	C398-1986
Qualifying State:	NV	List of Officers Due:	1/31/2010
Managed By:		Expiration Date:	
NV Business ID:	NV19861001072	Business License Exp:	

Registered Agent Information

Name:	RUTH E KAPLAN	Address 1:	5841 E CHARLESTON BLVD
Address 2:	#230-140	City:	LAS VEGAS
State:	NV	Zip Code:	89142
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

[View all business entities under this registered agent](#)

Financial Information

No Par Share Count:	1,000.00	Capital Amount:	\$ 0
No stock records found for this company			

Officers

☐ Include Inactive Officers

President - ATTORNEYS INVESTIGATIVE CONSULTANTS ALAN M KAPLAN

Address 1: 5841 E CHARLESTON BLVD

Address 2: #230-140

City:	LAS VEGAS	State:	NV
Zip Code:	89142	Country:	
Status:	Active	Email:	
Director - ALAN M KAPLAN			
Address 1:	5841 E CHARLESTON BLVD	Address 2:	#230-140
City:	LAS VEGAS	State:	NV
Zip Code:	89142	Country:	
Status:	Active	Email:	
Secretary - RUTH M KAPLAN			
Address 1:	5841 E CHARLESTON BLVD	Address 2:	#230-140
City:	LAS VEGAS	State:	NV
Zip Code:	89142	Country:	
Status:	Active	Email:	
Treasurer - RUTH M KAPLAN			
Address 1:	5841 E CHARLESTON BLVD	Address 2:	#230-140
City:	LAS VEGAS	State:	NV
Zip Code:	89142	Country:	
Status:	Active	Email:	

Actions/Amendments

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From: Danny Tarkanian [mailto:danny@grassrootsnv.info]
Sent: Friday, July 13, 2012 10:27 AM
To: AKaplan@LasVegasPI.com
Subject: Great News from the Tarkanian Campaign!

[View this email as Webpage](#)

Dear Supporter:

This has been an exciting week for my campaign. On Monday we received news that the most recent poll in Nevada's Congressional District 4 race has me with a substantial lead over my opponent, Stephen Horsford.

In addition to warmly receiving the positive message from my campaign the polls show great reluctance on the part of the voters to elect somebody like my opponent. He is a staunch supporter of the very tax and spend policies that are ruining our economy - not to mention he is the former Nevada chairman of Barack Obama's presidential campaign.

And today, the National Republican Congressional Committee moved our campaign to the top-tier of their Young Guns program, which singles out my campaign for having what the NRCC calls a clear path to victory through our ability to build a formidable campaign structure and achieve important goals and benchmarks. (See below)

My father taught me that when you have an opponent down you apply even greater pressure. That is why I need your help, now more than ever. If you could please donate one more time, you'll be taking advantage of this opportunity to make a significant impact in one of the most competitive races in the country.

Thank you in advance for your generous donation and thank you again for your continued support.

Danny Tarkanian

Danny Tarkanian Achieves 'Young Gun' Status

Nevada Republican Candidate Establishes Effective, Winning Campaign

Washington — The National Republican Congressional Committee today announced that Danny Tarkanian has reached 'Young Gun' status, the top tier of the Committee's four-level 'Young Gun' recruitment program.

Founded during the 2007-2008 election cycle by Reps. Eric Cantor (R-VA), Kevin McCarthy (R-CA) and Paul Ryan (R-WI), the 'Young Guns'

program is a Member-driven effort that is the primary method for recruiting strong candidates for both open-seat and challenger races.

Tarkanian is running for Nevada's open Fourth Congressional District.

7/24/2012

"Danny Tarkanian has met a series of rigorous goals that will put him in position to win on Election Day," said NRCC Chairman Pete Sessions (R-TX). "The momentum behind his campaign is proof-positive that Nevadans are fed up with President Obama's policies that spend too much, tax too much and borrow too much at the expense of hard-working families. Danny Tarkanian is leading the pack as Republicans continue to send a loud and clear message that we will hold Democrats accountable for their unpopular partisan agenda."

The 'Young Guns' program encourages candidates who have proven their ability to meet crucial campaign benchmarks to develop their campaigns further in order to achieve victory on Election Day. In achieving 'Young Gun' status, Danny Tarkanian has met organizational and fundraising benchmarks and has established himself as a strong contender. Tarkanian has reached the fourth and final step by establishing a clear path to victory through his ability to build a formidable campaign structure and achieve important goals and benchmarks.

As a former point guard at UNLV playing for his father, Danny Tarkanian excelled both on and off the court by being named a two time All-Conference player, All-American Honorable Mention, Rhodes Scholar Candidate and, a two time Academic All-American. Tarkanian, his wife Amy and their four children live in Las Vegas where he is the small business owner of the Tarkanian Basketball Academy that focuses on working with youth. With strong conservative ideals and a strong entrepreneurial background, Danny Tarkanian will help bring Washington Democrats' spending addiction under control and help get America back to work.

Daniel Scarpinato

Western Regional Press Secretary

National Republican Congressional Committee

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Danny Tarkanian for Congress
7220 S. Cimarron, Ste 100 Las Vegas, NV 89113